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January 31, 2022

VIA ECF

Hon. Sarah L. Cave
United States Magistrate Judge
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St., Courtroom 18A
New York, NY 10007-1312

Re: Giroto v. Chloe Boutique S.A., Inc. et al., 1:21-cv-10098-AJN-SLC
Request to Extend Soho Centrale LLC's Time to Respond to the Complaint

Dear Judge Cave:

We represent defendants Chloe Boutique S.A., Inc. and Soho Centrale, LLC (collectively "Defendants") in connection with the above-referenced action. Pursuant to Your Honor's Individual Practices in Civil Cases, we write with the consent of counsel for Plaintiff Luigi Giroto ("Plaintiff"), respectfully to request that Soho Centrale's time to respond to the Complaint be extended from January 28, 2022 to February 28, 2022. In support of this request, counsel for Defendants states that, while it previously appeared on behalf of Chloe Boutique in this action, it only recently was engaged to represent SoHo Centrale in this action. If granted, this extension of time will permit counsel to become familiar with the facts and allegations asserted against Soho Centrale in this action prior to submitting a response to the Complaint. Further, while Plaintiff's counsel yesterday filed with the Court an affidavit attesting to service on Soho Centrale via the New York Secretary of State, we were not aware of such service prior to the affidavit being filed. Accordingly, we submit that good cause exists to extend Soho Centrale's time to respond *nunc pro tunc*. This is Soho Centrale's first request for an extension of time to respond to the Complaint. If granted, this request will not affect any other dates scheduled in this action. As noted above, Plaintiff's counsel consents to this request.

We thank the Court in advance for its consideration of this request.

Respectfully submitted,

/s/ Michael F. Fleming

Michael F. Fleming

C: All Counsel of Record (via ECF)

Defendant Soho Centrale, LLC's requested extension (ECF No. 14) is GRANTED. Soho Centrale LLC shall answer or otherwise respond to the Complaint by **February 28, 2022**.

The Clerk of Court is respectfully directed to close ECF No. 14.

SO ORDERED 2/1/2022


SARAH L. CAVE
United States Magistrate Judge

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